

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
SON CHONG FULTON,)
a/k/a SON CHONG KIM,)
a/k/a SON CHONG RATLIFF,)
a/k/a SON CHONG DONINI,)
a/k/a ALIE SUNKON,)
)
Defendant.)

CRIMINAL NO. 15-cr-30177-SMY

STIPULATION OF FACTS

It is hereby agreed between the United States of America, through United States Attorney Stephen R. Wigginton and Assistant United States Attorney Stephen B. Clark (collectively referred to as the "Government") and the Defendant, SON CHONG FULTON, (hereinafter "Defendant") with the advice and consent of Adam Fein, counsel for the Defendant, as follows:

1. On or about the following dates, Defendant made deposits in the following amounts into a bank account she held at U.S. Bancorp, located in Belleville, Illinois:

January 22, 2014:	\$3000.00
February 3, 2014:	\$3000.00
February 10, 2014:	\$3000.00
May 20, 2014:	\$3000.00
May 23, 2014:	\$3000.00
May 28, 2014:	\$3000.00
May 30, 2014:	\$3000.00
June 3, 2014:	\$3000.00
June 20, 2014:	\$3000.00
June 27, 2014:	\$3000.00
June 30, 2014:	\$3000.00
July 7, 2014:	\$3000.00
July 15, 2014:	\$3000.00
July 24, 2014:	\$3000.00
July 29, 2014:	\$3000.00

August 8, 2014:	\$3000.00
August 22, 2014:	\$3000.00
August 27, 2014:	\$3000.00
September 2, 2014:	\$3000.00
September 8, 2014:	\$3000.00
September 16, 2014:	\$3000.00
September 23, 2014:	\$3000.00
September 29, 2014:	\$3000.00
October 8, 2014:	\$3000.00
October 14, 2014:	\$3000.00
October 22, 2014:	\$3000.00
November 4, 2014:	\$3000.00
November 6, 2014:	\$3000.00
November 12, 2014:	\$3000.00
November 17, 2014:	\$3000.00
November 25, 2014:	\$3000.00
December 2, 2014:	\$3000.00
December 8, 2014:	\$2000.00
December 15, 2014:	\$3000.00
December 23, 2014:	\$3000.00
January 2, 2015:	\$3000.00
January 12, 2015:	\$3000.00
January 20, 2015:	\$3000.00
January 30, 2015:	\$3000.00
February 3, 2015:	\$3000.00
February 9, 2015:	\$3000.00
March 2, 2015:	\$3000.00
March 6, 2015:	\$3000.00
March 26, 2015:	\$3000.00
April 3, 2015:	\$3000.00
April 24, 2015:	\$3000.00
April 28, 2015:	\$3000.00
May 4, 2015:	\$3000.00
May 18, 2015:	\$3000.00
May 26, 2015:	\$3000.00
May 27, 2015:	\$3000.00
June 1, 2015:	\$3000.00
June 8, 2015:	\$3000.00
June 19, 2015:	\$3000.00
June 22, 2015:	\$3000.00
June 23, 2015:	\$3000.00
June 29, 2015:	\$3000.00
June 30, 2015:	\$3000.00
July 6, 2015:	\$3000.00
July 8, 2015:	\$3000.00
July 21, 2015:	\$3000.00

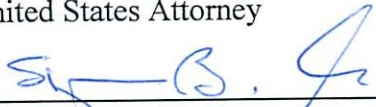
July 27, 2015: \$3000.00
July 29, 2015: \$3000.00
August 11, 2015: \$2800.00

2. At the time of the deposits, U.S. Bancorp was a domestic financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.


3. At the time of making said deposits, Defendant was aware that financial institutions are required to report to the U.S. Department of the Treasury currency transactions in amounts greater than \$10,000.

4. Defendant made the above deposits for the purpose of evading said reporting requirement.

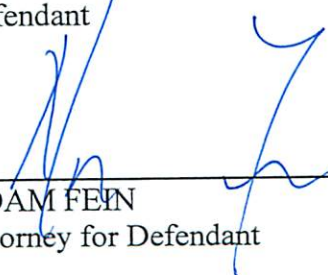
STEPHEN R. WIGGINTON
United States Attorney


STEPHEN B. CLARK
Assistant United States Attorney

Date: 12/11/15


SON CHONG FULTON
Defendant

Date: 12/11/15


ADAM FEIN
Attorney for Defendant

Date: 12/12/15